

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

NIKKO D'AMBROSIO,

Plaintiff,

v.

ABBIGAIL RAJALA, et al.,

Defendants.

Case No. 1:24-cv-00678

Hon. Sunil R. Harjani

**SPILL THE TEA DEFENDANTS' UNOPPOSED MOTION FOR LEAVE TO FILE
INSTANTER MOTION TO DISMISS IN EXCESS OF THE PAGE LIMIT**

Pursuant to Local Rule 7.1, defendants Spill the Tea, Inc., Blake Milbrand, and Paola Sanchez (the "Spill the Tea Defendants"), through their undersigned counsel, respectfully request that the Court grant them leave to file *instanter* an oversized Motion to Dismiss the Second Amended Complaint. In support of this unopposed motion, the Spill the Tea Defendants state as follows:

1. On October 11, 2024, plaintiff Nikko D'Ambrosio ("Plaintiff") filed his Second Amended Complaint (Dkt. 53). Plaintiff's Second Amended Complaint asserts six causes of action against each of the Spill the Tea Defendants.

2. The Spill the Tea Defendants have prepared a joint motion to dismiss the Second Amended Complaint. The joint motion to dismiss is 20 pages. It is attached as **Exhibit A**.

3. Local Rule 7.1 provides that "[n]either a brief in support of or in opposition to any motion . . . shall exceed 15 pages without prior approval of the court." N.D. Ill. L.R. 7.1.

4. The Spill the Tea Defendants seek leave to file their motion to dismiss in excess of 15 pages, as additional space is necessary for them to fully analyze their legal and factual

arguments. The Second Amended Complaint asserts six causes of action against each of the three Spill the Tea Defendants. Rather than filing three separate motions to dismiss, the Spill the Tea Defendants have prepared a joint motion to dismiss addressing all claims asserted against them.

5. Counsel for the Spill the Tea Defendants have conferred with counsel for Plaintiff regarding the relief sought in this motion. Counsel for Plaintiff has advised that they have no objection to this motion.

WHEREFORE, Defendants Spill the Tea, Inc., Blake Milbrand, and Paola Sanchez respectfully request that this Court grant their motion for leave to file the Spill the Tea Defendants' Rule 12(b)(6) Motion to Dismiss Plaintiff's Second Amended Complaint (attached here as Exhibit A) *instantly* and award all other relief that is proper under the circumstances.

Dated: November 27, 2024

Amanda N. Catalano
Megan E. Ryan
TABET DIVITO & ROTHSTEIN LLC
209 S. LaSalle Street, 7th Floor
Chicago, IL 60604
(312) 762-9450
acatalano@tdrlaw.com
mryan@tdrlaw.com

Respectfully submitted,

SPILL THE TEA, INC.,
PAOLA SANCHEZ, and
BLAKE MILLBRAND

By: /s/ Amanda N. Catalano